

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JENNIFER CLEMENS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

EXECUPHARM, INC., and
PAREXEL INTERNATIONAL CORP.

Defendants.

Case No.: 2:20-cv-03383-GJP

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENT PURSUANT TO RULE 23(e)**

Plaintiff Jennifer Clemens respectfully submits this motion for an order entering preliminary approval of a proposed class action settlement and directing notice of the settlement to the proposed settlement class pursuant to Federal Rule of Civil Procedure 23(e). This motion is not opposed by defendant ExecuPharm.

In support of this Motion, Plaintiff submits herewith the Parties’ Settlement Agreement and accompanying exhibits as Exhibit 1; a supporting Memorandum of Law; the Declaration of J. Austin Moore; and a Proposed Order for the Court’s consideration.

Dated: March 15, 2024

Respectfully submitted,

/s/ J. Austin Moore

Norman E. Siegel (*pro hac vice*)

J. Austin Moore (*pro hac vice*)

Caleb J. Wagner (*pro hac vice*)

STUEVE SIEGEL HANSON LLP

460 Nichols Road, Suite 200

Kansas City, Missouri 64112

Telephone: (816) 714-7100

siegel@stuevesiegel.com

moore@stuevesiegel.com

wagner@stuevesiegel.com

Mark S. Goldman (PA Bar No. 48049)

GOLDMAN SCARLATO & PENNY, P.C.

161 Washington Street, Suite 1025

Conshohocken, Pennsylvania 19428

Telephone: (484) 342-0700

goldman@lawgsp.com

*Attorneys for Plaintiff
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2024, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, and therefore, will be transmitted to all counsel of record by operation of the Court's CM/ECF system.

By: /s/ J. Austin Moore
ATTORNEY FOR PLAINTIFF